IN THE DISTRICT COURT IN AND FOR TULSA OKLAHOMA

STATE OF OKLAHOMA

JONATHAN LEVINE,

Plaintiff,

V.

STATE FARM FIRE & CASUALTY COMPANY

Defendants.

PETITION

PETITION

DISTRICT COURT

SEP - 1 2016

SALLY HOWE SMITH, COURT CLERK
STATE OF OKLA. TULSA COUNTY

TO 16 - U 3 1 7 5

COMES NOW Plaintiff, Jonathan Levine ("Plaintiff"), by and through Richardson, Richardson, and Boudreaux and for their Petition for Relief would show the Court, as follows:

## **PARTIES**

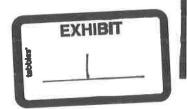
- 1. Plaintiffs reside in Tulsa County, State of Oklahoma.
- 2. Defendant State Farm Fire & Casualty Company ("State Farm") is a foreign corporation licensed to do business in the State of Oklahoma. State Farm does business in Tulsa County, State of Oklahoma.

## JURISDICTION AND VENUE

- 3. The contract at issue was entered into, and damages were sustained by Plaintiff, in Tulsa County, State of Oklahoma.
- 4. The Court has personal jurisdiction over the parties, subject matter over the claims asserted herein, and venue is proper in Tulsa County, State of Oklahoma.

## STATEMENT OF FACTS

- 5. On or about June 2, 2016, Plaintiff purchased an Automobile Insurance Policy from Defendant State Farm.
- 6. Plaintiff paid the premiums for his policy per the terms of the contract.



17. Defendant has breached the contract by failing to pay for necessary and proper repairs to the vehicle.

18. As a result of Defendant's breach of contract, Plaintiff has sustained damages.

## PRAYER

WHEREFORE, premises considered, Plaintiffs pray that this Court grant judgment against Defendant in an amount in excess of the statutory threshold for diversity jurisdiction pursuant to 28 U.S.C. § 1332, punitive damages in an amount sufficient enough to deter Defendant and all other similarly situated from the same of similar conduct, all costs and attorney fees incurred in the prosecution, pre and post judgment interest, and any further relief deemed appropriate by this Court considering the actions of the Defendant in this case.

Respectfully submitted,

Richardson, Richardson, and Boudreaux

Gary L. Richardson, OBA No. 7547

A. Seth Killman, OBA No. 21255

7447 South Lewis Avenue

Tulsa, Oklahoma 74136 Telephone (918) 492-7674

Facsimile (918) 493-1925

Email: glr@rrbok.com

ask@rrbok.com Attorneys for Plaintiff

Attorney Lien Claimed

Jury Trial Demanded